

**UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS**

UNITED STATES OF AMERICA

v.

VICTOR VARGAS

a/k/a Samuel Ortiz

Luis A. Ocasio

Defendant.

CRIMINAL NO. 04-10126-RWZ

VIOLATION:

Ct. 1: 18 U.S.C. §1542

False Statement in Passport Application

Ct. 2: 42 U.S.C. §408(a)(7)(B)-Misuse

of Social Security Number

Ct. 3: 18 U.S.C. §1028(a)(4)-Possession

of Unlawful Identification Document to

Defraud the United States

INDICTMENT

COUNT ONE: (18 U.S.C. §1542)(False Statement in Passport Application)

The Grand Jury charges:

On or about June 13, 2001, in the District of Massachusetts

VICTOR VARGAS a/k/a

Samuel Ortiz

Luis A. Ocasio

the defendant herein, did willfully and knowingly make a false statement on an application for a United States passport with the intent to induce and secure the issuance of a passport under the authority of the United States, either for his own use or the use by another.

All in violation of Title 18, United States Code, Section 1542.

COUNT TWO: 42 U.S.C. §408(a)(7)(B)–Misuse of Social Security Number

The Grand Jury further charges:

On or about June 13, 2001, in the District of Massachusetts,

**VICTOR VARGAS a/k/a
Samuel Ortiz
Luis A. Ocasio**

the defendant herein, with intent to deceive, falsely represented a number to be the social security account number assigned by the Commissioner of Social Security to him, when in fact such number is not the social security account number assigned by the Commissioner of Social Security to him.

All in violation of Title 42, United States Code, Section 408(a)(7)(B).

COUNT THREE: 18 U.S.C. §1028(a)(4)–Possession of Unlawful Identification Document to Defraud the United States

The Grand Jury further charges:

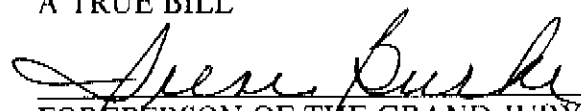
On or about June 13, 2001, in the District of Massachusetts.

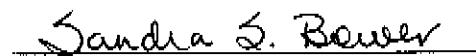
**VICTOR VARGAS a/k/a
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Luis A. Ocasio**

the defendant herein, did possess an identification document other than one issued lawfully for the use of the possessor, that is a Massachusetts identification card in the name of Samuel Ortiz, with the intent that such document be used to defraud the United States.

All in violation of Title 18, United States Code, Section 1028(a)(4).

A TRUE BILL



FOREPERSON OF THE GRAND JURY


SANDRA S. BOWER
Assistant U.S. Attorney

DISTRICT OF MASSACHUSETTS

April 21, 2004

Returned into the District Court by the Grand Jurors and filed.


DEPUTY CLERK 12:01 pm